

# EXHIBIT 2

Production::Begin Bates	Production::End Bates	Confidentiality Reason
VWNAOS085515	VWNAOS085515	Talking points re: VNA's work and recommendations. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS085516	VWNAOS085516	Talking points re: VNA's work and lead testing issue. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS090992	VWNAOS090992	Media Q&A re: lead testing issue. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091116	VWNAOS091116	Statement re: VNA's work and lead testing issue. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091117	VWNAOS091117	Statement re: water is safe. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091121	VWNAOS091121	Statement re: VNA's work and lead testing issue. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091123	VWNAOS091123	Statement re: water is safe. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091124	VWNAOS091124	Statement re: VNA's work and lead testing issue. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.

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VWNAOS091129	VWNAOS091129	Talking points re: VNA's work and recommendations. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS091152	VWNAOS091152	PR strategy memorandum containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS091160	VWNAOS091160	Key message points re: VNA's work, lead testing issue and safety statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS164985	VWNAOS164985	PR strategy document re: AG's lawsuit, containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS164993	VWNAOS164993	Key message points re: VNA's work, lead testing issue and safety statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS164994	VWNAOS164994	Key message points re: VNA's work, lead testing issue and safety statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS172775	VWNAOS172775	Privileged communications between VNA's attorneys. Plaintiffs have not challenged VNA's privilege assertions as to this document, but they have baselessly demanded that VNA withdraw all such designations.

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VWNAOS552956	VWNAOS552956	VNA statement re: Flint for legal review. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS552988	VWNAOS552988	Communications re: approval of Flint water lawsuit timeline. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS552989	VWNAOS552989	Communications re: approval of Flint water lawsuit timeline. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS552999	VWNAOS552999	Pitch re: VNA's recommendations. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS553020	VWNAOS553020	Veolia CEO Message on Flint. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS553047	VWNAOS553047	PR strategy document, prepared by VNA's public relations firm Rasky, containing sensitive, non-public information, including a recommended strategy for corporate communications related to the Flint water crisis, legal strategy, ongoing litigation discussions, and detailed information about VNA's non-public communication strategies. There is a risk of misuse or exploitation by competitors, potentially causing competitive harm if publicly disclosed. Initially marked as privileged in good faith but court-ordered for production, the document should remain confidential to minimize public dissemination pending a potential appeal.

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VWNAOS553075	VWNAOS553075	PR strategy document, prepared by VNA's public relations firm Rasky, containing sensitive, non-public information, including a recommended strategy for corporate communications related to the Flint water crisis, legal strategy, ongoing litigation discussions, and detailed information about VNA's non-public communication strategies. There is a risk of misuse or exploitation by competitors, potentially causing competitive harm if publicly disclosed. Initially marked as privileged in good faith but court-ordered for production, the document should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS329191	VWNAOS329191	Communications re: public affairs strategy. The document contains private, non-public information.
VWNAOS553105	VWNAOS553105	PR strategy document, prepared by VNA's public relations firm Rasky, containing sensitive, non-public information, including a recommended strategy for corporate communications related to the Flint water crisis, legal strategy, ongoing litigation discussions, and detailed information about VNA's non-public communication strategies. There is a risk of misuse or exploitation by competitors, potentially causing competitive harm if publicly disclosed. Initially marked as privileged in good faith but court-ordered for production, the document should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS553134	VWNAOS553134	Fact Sheet re: lead in water. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS544106	VWNAOS544106	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.

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VWNAOS544108	VWNAOS544108	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS553247	VWNAOS553247	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS553290	VWNAOS553290	Key message points re: VNA's work, lead testing issue and safety statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS331518	VWNAOS331519	Internal Budgets. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331543	VWNAOS331545	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331550	VWNAOS331552	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.

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VWNAOS331553	VWNAOS331554	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331555	VWNAOS331557	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331558	VWNAOS331560	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331561	VWNAOS331563	Internal Budget. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS331569	VWNAOS331571	Internal Budget and HR discussions. Document subject to an interlocutory order that may be appealable following final judgment; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially or competitively sensitive details.
VWNAOS526234	VWNAOS526234	Email re: process to obtain audio recording of February 18, 2015 meeting. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.

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VWNAOS260180	VWNAOS260180.0004	Response to Mother Jones. Document contains confidential information, which includes details unrelated to Flint. Disclosure of this private, non-public information could potentially expose VNA to risks such as oppression or competitive disadvantage.
VWNAOS332516	VWNAOS332516	Response to Mother Jones. Document contains confidential information, which includes details unrelated to Flint. Disclosure of this private, non-public information could potentially expose VNA to risks such as oppression or competitive disadvantage.
VWNAOS526894	VWNAOS526894	Response to Mother Jones. Document contains confidential information, which includes details unrelated to Flint. Disclosure of this private, non-public information could potentially expose VNA to risks such as oppression or competitive disadvantage.
VWNAOS526900	VWNAOS526900	Response to Mother Jones. Document contains confidential information, which includes details unrelated to Flint. Disclosure of this private, non-public information could potentially expose VNA to risks such as oppression or competitive disadvantage.
VWNAOS553469	VWNAOS553469	Email re: Draft Motion to dismiss, "HOT version" edited. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS222380	VWNAOS222381	Response regarding Boycott Divestment and Sanctions article. Document contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage.
VWNAOS448563	VWNAOS448564	Response regarding Boycott Divestment and Sanctions article. Document contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage.
VWNAOS222385	VWNAOS222386	Response regarding Boycott Divestment and Sanctions article. Document contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage.



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VWNAOS494815	VWNAOS494827	Strategic plans on communications. Document subject to a potential appeal; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially-sensitive details.
VWNAOS494840	VWNAOS494852	Strategic plans on communications. Document subject to a potential appeal; it contains private, non-public information that, if publicly disclosed, could lead to VNA suffering oppression or competitive disadvantage, as it also comprises commercially-sensitive details.
VWNAOS528237	VWNAOS528237	Email re: legal counsel retained to review Detroit Agreement and Appendices. Document contains competitively sensitive information. If disclosed publicly could result in a competitive disadvantage for VNA.
VWNAOS528366	VWNAOS528366	Communications re: Detroit Sales Tax Purchasing Agency Agreement. Document contains competitively sensitive information. If disclosed publicly could cause a competitive disadvantage to VNA.
VWNAOS550141	VWNAOS550141	Invoice from a law firm related to general counsel services for a proposed response to a request for proposal for the Oklahoma City Water Utilities Trust. The invoice reveals the legal services provided in relation to this proposal.
VWNAOS550142	VWNAOS550142	Invoice from a law firm related to general counsel services for a proposed response to a request for proposal for the Oklahoma City Water Utilities Trust.
VWNAOS521990	VWNAOS521990	Privileged communications between VNA's attorneys. Privilege not challenged.
VWNAOS522059	VWNAOS522062	Privileged communications between VNA's attorneys. Privilege not challenged.
VWNAOS522063	VWNAOS522066	Privileged communications between VNA's attorneys. Privilege not challenged.

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VWNAOS555305	VWNAOS555305	Communications involving VNA's in-house lawyers, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS555464	VWNAOS555464	Flint timeline edits provided by VNA's in-house counsel. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS555473	VWNAOS555473	Email re: HR communications about David Gadis. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS555522	VWNAOS555522	Communications between VNA and PR consultant re: non-public strategy related to the Flint water crisis. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS555574	VWNAOS555574	Communications re: VNA's storyline. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS555596	VWNAOS555596	Communications involving VNA's in-house lawyers, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS555597	VWNAOS555597	Communications involving VNA's in-house lawyers, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.

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VWNAOS555598	VWNAOS555598	Communications involving VNA's in-house lawyers re: VNA's storyline, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS555602	VWNAOS555602	Email re: approval of storyline and statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS536974	VWNAOS536974	Communications involving VNA's in-house lawyers, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS555806	VWNAOS555806	Communications re: timeline. Flint timeline edits provided by VNA's in-house counsel. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS555873	VWNAOS555873	Communications involving VNA's in-house lawyers, initially withheld by VNA based on its good-faith belief that they were protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS556604	VWNAOS556604	Communications with VNA's legal team re: VNA's narrative. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556606	VWNAOS556606	Talking points re: Veolia narrative. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.

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VWNAOS556763	VWNAOS556763	Communications with VNA's legal team re: VNA's narrative. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556764	VWNAOS556764	VNA's safety statement. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556784	VWNAOS556784	VNA's safety statement. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556785	VWNAOS556785	Talking points re: Veolia narrative. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556786	VWNAOS556786	Talking points re: VNA's work and lead testing. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS556940	VWNAOS556940	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS556942	VWNAOS556942	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.

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VWNAOS556989	VWNAOS556989	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS557041	VWNAOS557041	PR strategy document containing non-public information, which VNA initially withheld based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines. The document should remain confidential pending a possible appeal.
VWNAOS557181	VWNAOS557181	Communications involving VNA's counsel. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS557186	VWNAOS557186	Communications involving VNA's counsel. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS557195	VWNAOS557195	Email re: news article on AG's announcement of criminal charges. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS557207	VWNAOS557207	Communications re: holding statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS557212	VWNAOS557212	Communications re: holding statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS557213	VWNAOS557213	Communications re: holding statement. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.

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VWNAOS558399	VWNAOS558399	Proposed arguments for a motion to dismiss the Attorney General's complaint against VNA prepared by VNA's counsel. VNA initially withheld this document based on its good-faith belief that it was protected from disclosure by the attorney-client privilege or work product doctrines; the document should remain confidential pending a possible appeal.
VWNAOS558968	VWNAOS558968	Email re: AG response statement for review. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS558981	VWNAOS558981	Communications re: arguments to assert in VNA's Motion to Dismiss AG's Flint Suit. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559054	VWNAOS559054	Email re: Veolia-Flint press clips and news articles. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559056	VWNAOS559056	Email re: Veolia-Flint press clips and news articles. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559057	VWNAOS559057	Email re: Veolia-Flint press clips and news articles and VNA's response. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS551868	VWNAOS551868	Document produced following the Court's in-camera review; it should remain confidential pending any potential appeal.

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VWNAOS559324	VWNAOS559324	Communications re: PR and legal strategy concerning a first amended complaint. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559325	VWNAOS559325	Communications re: Non-Parties at Fault. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559351	VWNAOS559351	Communications re: VNA's statements on Mays and Guertin cases circulated among legal and PR teams. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.
VWNAOS559379	VWNAOS559379	Communications re: Flint Veolia website. Document initially marked as privileged in good faith but court-ordered for production; it concerns private information and should remain confidential to minimize public dissemination pending a potential appeal.